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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W. Room TW A325  
Washington D.C. 20554

**Ex-Parte**

*Re: Application by SBC Communications Inc. for Authorization Under Section 271 of the Communications Act to Provide In-Region Interlata Service in the States of Kansas and Oklahoma. Docket No. 00-217*

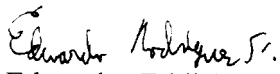
Dear Ms. Salas:

At the request of staff, SBC is filing this ex parte to clarify the expected effective timeframe of its zero rate non-recurring charge (NRC) for the migration of existing SWBT service to the UNE platform as explained in the Kansas 271 Agreement (K2A) Attachment 6, section 14.2. This rate is set at zero, until the Kansas Corporation Commission (KCC) is petitioned by a party to reinvestigate whether recovery of costs incurred in the migration of existing SWBT service to the UNE platform necessitates a non-zero rate. It is unlikely that any party, save SWBT, would make such a petition. SWBT currently has no plans to petition the KCC to reconsider the zero rate NRC for the migration of existing SWBT service to the UNE platform.

Also at the request of staff, SWBT is filing the KCC's December 21 Order on Petitions for Reconsideration and Clarification regarding NRCs. Please find that order attached to this letter.

Pursuant to the commission's rules governing ex parte communications, I am enclosing two copies of this letter and attachment.

Sincerely,

  
Eduardo (Eddie) Rodriguez  
Director – Federal Regulatory

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**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

Before Commissioners:            John Wine, Chair  
   Cynthia L. Claus  
   Brian J. Moline

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MBO  
JA

In the Matter of the Application of Sprint            )  
Communications Company, L.P., United Telephone        )  
Company of Kansas, United Telephone Company of        )  
Eastern Kansas, United Telephone Company of South        )  
Central Kansas, and United Telephone Company of        )  
Southeastern Kansas for the Commission to Open a        )  
Generic Proceeding on Southwestern Bell Telephone        )  
Company's Rates for Interconnection, Unbundled        )  
Elements, Transport and Termination, and Resale.        )

Docket No. 97-SCCC-149-GIT

**ORDER ON PETITIONS FOR RECONSIDERATION AND  
CLARIFICATION**

The above-captioned matter comes on before the State Corporation Commission of the State of Kansas ("Commission") upon Petition of Southwestern Bell Telephone Company ("SWBT") for Clarification and/or Reconsideration of Certain Findings in the Order Regarding Non-Recurring Charges for Unbundled Network Elements; Petition of AT&T Communications of the Southwest, Inc. ("AT&T") for Reconsideration of Order Regarding Non-Recurring Charges for Unbundled Network Elements; and Petition of Birch Telecom of Kansas, Inc. ("Birch Telecom") for Clarification. After examining its files and records, and being duly advised in the premises, the Commission finds and concludes:

**A. CASE SUMMARY**

1. On February 19, 1999, the Commission issued its Final Order Establishing SWBT's Prices for Interconnection and UNES [Unbundled Network Elements] (referred to hereafter as "February 19, 1999 Order"). The February 19, 1999 Order established general parameters for

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recurring and non-recurring cost elements that were intended to spur competition in local telephone markets by giving new entrants unbundled access to SWBT's existing network. Specifically, the non-recurring cost elements were priced in Attachment B to that order. The Commission granted reconsideration for the purpose of obtaining additional cost study information regarding non-recurring charges, consistent with certain parameters, and allowing additional time to consider the comments from the parties. Order on Reconsideration, dated April 6, 1999; Order on Reconsideration, dated September 19, 1999; and Order on Petition for Stay and/or Motion for Extension of Time, dated October 15, 1999.

2. Having received the additional cost study information and comments of the parties, the Commission issued its Order Regarding Non-Recurring Charges for Unbundled Network Elements on November 3, 2000 (hereinafter referred to as "November 3, 2000 Order"). The November 3, 2000 Order revised the prices for non-recurring cost elements that were set forth in the original Attachment B of the February 19, 1999 Order. The November 3, 2000 Order incorporated Revised Attachment B which specifically identified the non-recurring cost elements under consideration, the price and the rationale, including cost study basis, for the specific price determination.

3. On November 22, 2000, Birch Telecom filed a Petition requesting the Commission to clarify that SWBT is obligated to true up the final prices set by the November 3, 2000 Order to those prices paid by a Competitive Local Exchange Carrier ("CLEC") from February 19, 1999 to the present. Birch Telecom urged the Commission to establish an effective date for the final prices as of February 19, 1999.

4. On November 22, 2000, AT&T timely filed a Petition seeking reconsideration or clarification of the Commission's order. In general, AT&T argued that the non-recurring rates established in Revised Attachment B do not comply with Total Element Long Run Incremental Costs ("TELRIC") principles and urged the Commission to essentially multiply SWBT's proposed costs times a five percent cost fall out factor to determine the appropriate price. AT&T also urged the Commission to order a true up based upon equitable grounds. On December 8, 2000, AT&T filed a Response to SWBT's Petition. AT&T argued that SWBT's Petition should be denied because it does not raise any new substantive issues but urged the Commission to clarify the determinations made with respect to new combinations of unbundled network elements ("UNEs").

5. On November 22, 2000, SWBT filed a Petition requesting the Commission to reconsider and clarify its November 3, 2000 Order. In general, SWBT sought clarification regarding compliance with the order. SWBT also reiterated its arguments concerning Dedicated Inside Plant ("DIP"). On December 8, 2000, SWBT responded to Birch Telecom's implementation concerns and argued that the obligation to true up prices currently charged with prices established by Commission order is controlled by the interconnection agreement signed by the CLEC. SWBT also responded to AT&T's Petition and argued that AT&T misinterpreted the Commission's order and attempted to introduce new issues not previously raised in a timely manner.

**B. EFFECTIVE DATE OF THE PRICES SET FORTH IN REVISED ATTACHMENT B**

6. Paragraph 55 of the November 3, 2000 Order may have created uncertainty with respect to the effective date. While it is true that orders are generally effective upon the date issued, the November 3, 2000 Order was an order on reconsideration. Pursuant to K.S.A. 1999 Supp. 66-1181, the prices for the non-recurring cost elements became effective February 19, 1999,

notwithstanding the filing of any petition for reconsideration. The November 3, 2000 Order revised and corrected those prices; however, the effective date of the non-recurring charge order remained unchanged. Accordingly, the prices set forth in Revised Attachment B were effective as of the date of the initial order, February 19, 1999. Furthermore, the corrected prices in Revised Attachment B, dated December 21, 2000, and attached to this order, are effective as of February 19, 1999.

7. The parties were free to negotiate with SWBT or petition for arbitration. The terms of the negotiated agreement are controlling. The Commission has not been provided a legal basis to reform any agreement that does not contain a true up provision. On the other hand, if the agreement contains a true up provision, SWBT's obligation extends back to the effective date of February 19, 1999.

8. The Commission is aware that all arbitrator decisions conditioned the arbitrated prices upon the final price determinations made in this proceeding. Any agreement implementing the arbitrator's decision is subject to true up effective as of February 19, 1999.

**C. LOOP CONDITIONING AND OTHER CHARGES RELATED TO DIGITAL SUBSCRIBER LINE SERVICE ("DSL")**

9. SWBT pointed out that Revised Attachment B contains non-recurring cost elements that have been identified as being related to DSL charges. For these cost elements, the question arises whether SWBT should use the rates ordered by the Commission in the November 3, 2000 Order or the interim rates ordered by the Commission in the generic DSL proceeding, Docket No. 01-GIMT-032-GIT. The Commission stated in paragraph 62 that the Commission did not intend to address DSL charges in the November 3, 2000 Order. Rather, the Commission intends to focus and address DSL charges in Docket No. 01-GIMT-032-GIT. Accordingly, Revised Attachment B, dated

December 21, 2000, is corrected to reflect that final charges for these elements will be determined in Docket No. 01-GIMT-032-GIT. To the extent revised Attachment B specifies non-recurring cost elements that relate to the DSL charges, the Commission finds those cost elements should be decided in the generic DSL proceeding, Docket No. 01-GIMT-032-GIT. SWBT is directed to implement and incorporate the interim prices authorized in 01-GIMT-032-GIT in its UNE Master List and in its K2A prices filed in Docket No. 97-SWBT-411-GIT. Any interconnection agreement or arbitrator's decision conditioned upon true up in this docket with the final price determinations for these non-recurring cost elements shall carry over to Docket No. 01-GIMT-032-GIT.

**D. COMBINATIONS OF UNES**

10. SWBT asks the Commission to reconsider and clarify that the inclusion of certain cross connect prices in the November 3, 2000 Order, does not require SWBT to perform new combinations of UNEs outside its voluntary commitment contained in the K2A filed in Docket No. 97-SWBT-411-GIT, and only applies to the K2A offering. SWBT Petition at ¶ 24. AT&T states in its response that the issue of whether SWBT must provide "new combinations" has been considered or is being considered in other dockets (such as 97-AT&T-290-ARB; and 97-SWBT-411-GIT), and need not be addressed in this case. AT&T Response at 3.

11. AT&T is correct that the issue has been or is being considered in other Commission dockets. In fact, the Commission stated in this proceeding that "the combination of elements matter will be resolved in the AT&T/SWBT interconnection arbitration in Docket No. 97-AT&T-290-ARB." Order on Reconsideration, dated September 17, 1999 at ¶97. The Commission has not addressed the policy issue of UNE combinations in this matter. The Commission will defer resolution of this issue to other Commission dockets now investigating the issue, and this is noted

on Revised Attachment B, dated December 21, 2000.<sup>1</sup> Meanwhile, the Commission has appropriately set cross connect prices, as required by the K2A, and those prices shall remain listed on SWBT's UNE Master List.

**E. FIVE PERCENT FALLOUT FACTOR**

12. AT&T urged the Commission to merely multiply SWBT's proposed costs times the five percent cost fallout factor to determine a recommended price. In AT&T's Petition, at paragraph 11, AT&T provides a mathematical example of how applying the five percent factor to individual stages of a study is equivalent to applying the factor to the study as a whole. However, this is correct only under the assumptions stated by AT&T in its example. Unfortunately, those assumptions were not adhered to when AT&T performed its revisions to SWBT's cost studies and submitted the results to the Commission. Admittedly, AT&T's mathematical example assumes SWBT treated its processes as 100 percent manual processes. However, SWBT's cost study results did not reflect 100 percent manual processing at the point which AT&T multiplied by five percent. Commission Staff ("Staff") pointed out in its review of AT&T's studies:

AT&T correctly applied the 5% factor to other studies as well, but instead of substituting this factor for the probabilities used by SWBT in its original study, it applied the 5% factor to the new result of the original SWBT probabilities. The latter procedure has the effect of overshooting the mark, yielding a net fallout percentage of less than 5%.

Staff Comments, filed December 17, 1999, at 12 (emphasis added). Because AT&T failed to recognize that the SWBT studies incorporated a fallout percentage, AT&T's recommended adjustment to the Commission determined weighting and fallout percent cannot be accepted.

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<sup>1</sup>/See Reference Number 13 on Revised Attachment B, dated December 21, 2000.

13. The Commission identified on Revised Attachment B the specific studies where AT&T's cost estimation was derived solely from multiplying SWBT's cost results by five percent. AT&T states that "the Order does not specify to which study or studies this criticism applies"; however, AT&T's own citation to the November 3, 2000 Order indicates that it was aware of the cost studies to which this criticism applied. AT&T Petition at 8, f.n. 14 and 15. Revised Attachment B was incorporated into the November 3, 2000 Order. It included reference number 3, which identifies where the Commission found "prices based solely upon the application of the five percent factor are not acceptable." AT&T's claim that the cost studies at issue were not identified is without merit.

14. AT&T argues that the November 3, 2000 Order does not comply with TELRIC principles because the Commission did not accept its application of the five percent fallout factor. In making this argument, AT&T erroneously assumed SWBT's cost studies were based upon 100 percent manual processes. Furthermore, the fact that one cost study used a different level of labor costs does not, as AT&T suggests, indicate a study is not TELRIC-based. In this proceeding, AT&T performed its TELRIC cost study to minimize the level of labor costs while SWBT maximized the level of labor costs used in its TELRIC cost studies. The Commission weighted these cost studies to more properly reflect an appropriate level of labor costs to be used in calculating a TELRIC-based price. Moreover, further precision was allowed to the extent record evidence supported such precision. The Commission specifically referenced eleven separate reasons for determining a final price. AT&T's argument is without merit.

**F. WHITE PAGES LISTING ZONE 3 URBAN PRICE FOR PAGE IN SWBT DIRECTORY**



15. AT&T requests the Commission to change the rate for this element to reflect the rate adopted by the Texas Public Service Commission. The November 3, 2000 Order merely corrected the listing of the element to reflect that this element was a non-recurring cost element and not a recurring cost element. Directory White Pages had been listed in the original Attachment A of the February 19, 1999 Order as a recurring cost element. At no time prior to the November 3, 2000 Order did any party, including AT&T, challenge the stated price. Because AT&T's argument has not been presented in a timely manner, the Commission declines to consider any adjustment in this proceeding at this time. K.A.R. 82-1-235(b)(4).

**G. CIRCUIT PROVISIONING CENTER**

16. AT&T requests the Commission apply the five percent fallout for the Circuit Provisioning Center ("CPC") functions. AT&T contends that these are functions that should be within the mechanized process contemplated by the Commission and that only a five percent fallout should be allowed. SWBT argues, on the other hand, that its study used a fallout factor that was substantially less than 100 percent. SWBT's Response, dated December 8, 2000, at 6; SWBT Unbundled Loop Cost Study filed November 9, 1999. However, SWBT's study shows 100 percent manual processing. Accordingly, the Commission finds that the rates for the 2 wire and 4 wire analog loops, and 4 wire digital loops should be adjusted to apply a five percent fallout factor for the CPC process. The new rates for these loops shown on Revised Attachment B, dated December 21, 2000 are slightly lower than the Commission's November 3, 2000 Order.<sup>2</sup> The Commission adjusted the costs provided by AT&T to include common costs in the rate development. The rates for 2 wire

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<sup>2</sup>See Reference Number 12 on Revised Attachment B, dated December 21, 2000.

digital loops will not be determined at this time and will be set in the DSL docket as mentioned above.

17. For the 4 wire-PRI study, AT&T argues that SWBT's cost studies did not comply with the Commission directive requiring the 80 percent Dedicated Outside Plant ("DOP") factor to be applied in determining the non-recurring charges for all loops. AT&T recommends that the Commission make a specific adjustment to the charges to incorporate the 80 percent DOP. In the November 3, 2000 Order, the Commission stated that "the Commission agrees with AT&T that the 80 percent DOP factor should be applicable to all loop types." In reviewing SWBT's cost studies, Staff observed that "PRI and 4 wire loops use 0 percent DOP assumption." Staff Comments, dated December 17, 1999 at 16. The Commission accepts AT&T's argument and will apply the 80 percent DOP factor to determine the non-recurring charges for the 4 wire-PRI. The Commission notes that it has corrected a transposition in AT&T's calculation and added a factor for common costs. The rates for the 4 wire analog loops were set based upon relationship to similar rate elements, and that relationship is extended to this order. The new rates for these elements are shown on Revised Attachment B, dated December 21, 2000.<sup>3</sup>

18. Finally, AT&T argues that the 80 percent DOP should be extended to subloop provisioning. The nature of subloop provisioning is to unwire the existing dedicated outside plant. The 80 percent DOP factor, ordered by the Commission, is for whole loops and does not apply to subloop provisioning. The Commission declines to make any further adjustment to the non-recurring charges for the subloop elements.

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<sup>3</sup>See Reference Number 14 on Revised Attachment B, dated December 21, 2000.

#### **H. SERVICE ORDER CHARGE**

19. AT&T points out that the cost studies for mechanized service orders filed by AT&T and SWBT are in agreement and that the Commission did not change the non-recurring charge for this element from the \$5.00 rate set in its prior February 15, 1999 Order. The Commission accepts AT&T's argument and adopts a rate of \$2.35 for mechanized orders. The Commission notes that changing this rate will require an accompanying rate adjustment for manual orders. Accordingly, the rate for manual orders is set at \$12.35.

#### **I. APPLICATION OF NON-RECURRING CHARGES ACCOMPANYING CUSTOMER MOVES**

20. AT&T requests the Commission to clarify that "in the case of moves where the previous customer in the location had SWBT service or a service provided over SWBT UNEs, SWBT shall not apply each individual NRC, but should only charge the service order charge as in the case of a UNE platform conversion." AT&T's Petition at 19. SWBT, on the other hand, contended that "AT&T is asking the KCC to do is to order a new combination without applying the appropriate non-recurring charges." SWBT's Response at 8. SWBT also contended that AT&T previously recognized that "[o]n 20% of all non-conversion loops, costs would be incurred by SWBT." SWBT's Response at 7-8. AT&T's request conflicts with the application of the DOP factor because DOP already assumes no dispatch 80 percent of the time. The DOP factor applied by the Commission incorporates the cost efficiencies associated with dedicated outside plant. Therefore, AT&T's request is denied.

#### **J. CROSS LOOP CROSS CONNECT PRICES**

21. SWBT notes that the original Attachment B to the February 19, 1999 Order identified non-recurring charges for loop to DCS cross connects but that Revised Attachment B did not do so.

SWBT seeks clarification of whether the loop to DCS cross connects should have been included on Revised Attachment B. The Mux function includes the DCS scenario noted by SWBT, and the prices for these elements are set forth in Revised Attachment B under the heading of Loop Cross Connects to Collaction/Mux/Interoffice. Accordingly, the Revised Attachment B did not omit a charge for the function referenced by SWBT. However, as noted above, several cross connect rates are interim subject to final determination in Docket No. 01-GIMT-032-GIT.

**IT IS, THEREFORE, BY THE COMMISSION ORDERED THAT:**

(A) The foregoing statements, discussion, and analysis are hereby adopted as Findings and Conclusions of the Commission.

(B) The petitions for reconsideration and clarification are ruled upon as stated above. Any matter that has not been expressly ruled upon is denied.

(C) The prices set forth in the Revised Attachment B, dated December 21, 2000, are hereby accepted as the final prices of the non-recurring unbundled network elements, with the exception of those elements to be priced in Docket No. 01-GIMT-032-GIT.

(D) SWBT shall immediately implement the November 3, 2000 Order and modifications made herein. SWBT is directed to refile its UNE Master List in accordance the November 3, 2000 Order and the modifications made herein.

(E) SWBT shall immediately incorporate the rates established in the November 3, 2000 Order and in this order into all existing interconnection agreements that have established rates subject to determinations in this docket. SWBT's obligation to true up extends back to the effective date of February 19, 1999 Order.

(F) Pursuant to K.S.A. 66-118b, the parties have fifteen days, plus three days if service of this Order is by mail, from the date of this Order in which to petition the Commission for reconsideration of any matter decided herein.

(G) The Commission retains jurisdiction over the subject matter and parties for the purpose of entering such further order or orders as it may deem necessary.

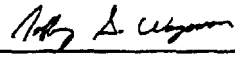
**BY THE COMMISSION IT IS SO ORDERED.**

Wine, Chr.; Claus, Com.; Moline, Com.

Dated: DEC 21 2000

ORDER MAILED

DEC 21 2000

  
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Jeffrey S. Wagaman  
Executive Director

## Kansas UNE Nonrecurring Charges

### Unbundled Network Element                      Final Rates                      Reference

	<u>Initial</u>	<u>Additional</u>	
<b><u>Network Interface Device (NID)</u></b>			
Disconnect Loop from Inside Wiring, per NID	\$20.49	\$10.25	1

#### Unbundled Loops

2-Wire Analog			
Zone 1/Rural	\$28.45	\$13.55	C,12
Zone 2/Suburban	\$28.45	\$13.55	C,12
Zone 3/Metro	\$28.45	\$13.55	C,12

Conditioning for 5dB Loss	\$22.76	\$8.58	5
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4-Wire Analog			
Zone 1/Rural	\$47.60	\$23.00	C,4
Zone 2/Suburban	\$47.60	\$23.00	C,4
Zone 3/Metro	\$47.60	\$23.00	C,4

2-Wire Digital BRI			
Zone 1/Rural	TBD/DSL General Investigation		C
Zone 2/Suburban	Docket 01-GIMT-032-GIT		C
Zone 3/Metro	Interim Rates have been set		C

4-Wire Digital PRI			
Zone 1/Rural	\$68.40	\$27.25	C,14
Zone 2/Suburban	\$68.40	\$27.25	C,14
Zone 3/Metro	\$68.40	\$27.25	C,14

#### Unbundled DSL Capable Loops

TBD/DSL General Investigation  
Docket 01-GIMT-032-GIT  
Interim Rates have been set

#### Subloop Unbundling

##### Loop Feeder

2-Wire Analog			
Zone 1/Rural	\$23.25	\$9.65	2
Zone 2/Suburban	\$23.25	\$9.65	2
Zone 3/Metro	\$23.25	\$9.65	2

2-Wire Digital (BRI)			
Zone 1/Rural	\$55.90	\$23.05	2
Zone 2/Suburban	\$55.90	\$23.05	2
Zone 3/Metro	\$55.90	\$23.05	2

## Kansas UNE Nonrecurring Charges

<u>Unbundled Network Element</u>	<u>Final Rates</u>		<u>Reference</u>
	<u>Initial</u>	<u>Additional</u>	
<b>4-Wire Analog</b>			
Zone 1/Rural	\$50.15	\$19.90	4
Zone 2/Suburban	\$50.15	\$19.90	4
Zone 3/Metro	\$50.15	\$19.90	4
<b>4-Wire Digital PRI</b>			
Zone 1/Rural	\$83.65	\$38.05	2
Zone 2/Suburban	\$83.65	\$38.05	2
Zone 3/Metro	\$83.65	\$38.05	2
<u>Loop Distribution</u>			
<b>2-Wire Analog</b>			
Zone 1/Rural	\$107.75	\$43.70	2
Zone 2/Suburban	\$107.75	\$43.70	2
Zone 3/Metro	\$107.75	\$43.70	2
<b>2-Wire Digital (BRI)</b>			
Zone 1/Rural	\$117.55	\$47.15	2
Zone 2/Suburban	\$117.55	\$47.15	2
Zone 3/Metro	\$117.55	\$47.15	2
<b>4-Wire Analog</b>			
Zone 1/Rural	\$118.65	\$48.65	4
Zone 2/Suburban	\$118.65	\$48.65	4
Zone 3/Metro	\$118.65	\$48.65	4
<b>4-Wire Digital PRI</b>			
Zone 1/Rural	\$170.50	\$67.50	2
Zone 2/Suburban	\$170.50	\$67.50	2
Zone 3/Metro	\$170.50	\$67.50	2
<b><u>Customized Routing</u></b>	ICB		
<b><u>Ports</u></b>			
Analog Line-Side Port	N/A	N/A	See Order dated 11/3/00
ISDN BRI Port	\$6.47	\$3.53	1, 3
ISDN PRI Port	\$214.53	\$98.53	1, 3
Analog DID Trunk Port	\$62.00	\$25.00	1, 3
Digital DS1 Trunk Port	\$162.00	\$25.00	1, 3

## Kansas UNE Nonrecurring Charges

<u>Unbundled Network Element</u>	<u>Final Rates</u>		<u>Reference</u>
	<u>Initial</u>	<u>Additional</u>	

### Cross Connects

#### Loop Cross Connects to Collocation/Mux/Interoffice

Analog Loop to Collocation, with testing	TBD/DSL General Investigation		C	4
2 Wire X-Connect	Docket 01-GIMT-032-GIT		C	
4-Wire X-Connect	Interim Rates have been set			
Analog Loop to Collocation, w/o testing	TBD/DSL General Investigation		C	5
2 Wire X-Connect	Docket 01-GIMT-032-GIT		C	
4-Wire X-Connect	Interim Rates have been set			
Analog Loop to Collocation, w/o IDF and with testing	TBD/DSL General Investigation		C	6
2 Wire X-Connect	Docket 01-GIMT-032-GIT		C	
4-Wire X-Connect	Interim Rates have been set			
Analog Loop to Collocation, w/o IDF & w/o testing	TBD/DSL General Investigation		C	7
2 Wire X-Connect	Docket 01-GIMT-032-GIT		C	
4-Wire X-Connect	Interim Rates have been set			
Digital Loop to Collocation	TBD/DSL General Investigation			
2 Wire BRI	Docket 01-GIMT-032-GIT		C	8
2 Wire BRI w/o testing	Interim Rates have been set		C	
4 Wire PRI	\$46.65	\$32.15	4	
4 Wire PRI w/o testing	\$46.65	\$32.15	4	
Analog Loop to Switch Port				
2 Wire	\$26.70	\$25.55	C,13	9
Digital Loop to Switch Port				
2 Wire BRI	\$26.70	\$25.55	C,13	10
4 Wire PRI	\$46.65	\$32.15	C,13	

#### Switch Port Cross Connects to Collocation/MUX/Interoffice

Switch Port to Collocation				
Analog Line Port to Collocation				
2 Wire X-Connect	\$23.65	\$17.70	2	
4 Wire X-Connect	\$37.30	\$29.75	2,4	
ISDN Port To Collocation				
2 Wire BRI	\$27.10	\$21.45	2	
4 Wire PRI	\$42.75	\$36.05	2,4	
Analog DID Trunk Port to Collocation	\$23.65	\$17.70	11	
DS1 Trunk Port to Collocation	\$42.75	\$36.05	11	



## Kansas UNE Nonrecurring Charges

<u>Unbundled Network Element</u>	<u>Final Rates</u>		<u>Reference</u>
	<u>Initial</u>	<u>Additional</u>	
<u>Channelized DS1 Basic Cross Connects</u>			
Capacity for Virtual Remote Terminal-Install	\$11.64	\$11.64	1
Capacity for Virtual Remote Terminal-Disc.	\$7.08	\$7.08	1
<u>Dedicated Transport Cross Connects to Collocation</u>			
DS1	\$98.50	\$80.30	3,4
DS 3	\$68.75	\$50.55	3,4
OC3	\$56.50	\$44.10	3,4
OC12	\$56.50	\$44.10	3,4
OC48	Deferred per 6/23/00 Reconsideration Order		
<u>Dark Fiber Cross Connects</u>	\$56.50	\$44.10	11
<u>Unbundled Switch Port-Vertical Features</u>			
<u>Analog Line Port Features (per feature per port):</u>	\$0.05		7
Call Waiting			
Call Forwarding/Variable			
Call Forwarding/Busy Line			
Call Forwarding/Don't Answer			
Three-Way Calling			
Speed Calling-8			
Speed Calling-30			
Auto Call Back/Auto Redial			
Distinctive Ring/Priority Call			
Selective Call Rejection/Call Blocker			
Auto Recall/Call Return			
Selective Call Forwarding			
Calling Number Delivery			
Calling Number/Name Blocking			
Remote Access to Call Forwarding			
<u>Analog Line Port Features:</u>			
Personalized Ring	\$0.20		7
Hunting Arrangement	\$2.55		2

**Kansas UNE Nonrecurring Charges**

<u>Unbundled Network Element</u>	<u>Final Rates</u>		<u>Reference</u>
	<u>Initial</u>	<u>Additional</u>	
<b>Usage Sensitive Analog Line Port Features:</b>			
Call Trace per Feature per port	\$0.76		1
<b>ISDN BRI Port Features (per B Channel)</b>			
CSV/CSD per ISDN BRI port	\$6.47	\$3.53	11
Basic Electronic Key Terminal Service	\$5.41		1, 3
Includes:			
Bridged Call Exclusion			
Bridging			
Call Forwarding/Don't Answer			
Call Forwarding/Interface Busy			
Call Forwarding/Variable			
Message Waiting Indicator			
Speed Call/Long			
Speed Call/Short			
Three Way Conference Calling			
Call Appearance Call Handling EKTS	\$7.20		1, 3
CACH EKTS Includes:			
Additional Call Offering (Inherent)			
Bridged Call Exclusion			
Bridging			
Call Forwarding/Don't Answer			
Call Forwarding/Interface Busy			
Call Forwarding/Variable			
Intercom			
Key System Coverage for Analog Lines			
Message Waiting Indicator			
Speed Call/Long			
Speed Call/Short			
Three way conference calling			
Basic Individual Features:	\$4.24		1
Additional Call Offering			
Call Forwarding/Don't Answer			
Call Forwarding/Interface Busy			
Call Forwarding/Variable			
Calling Number Delivery			
Hunt Group for CSD			
Hunt Group for CSV			
Message Waiting Indicator			
Secondary Only Telephone Number			
Three Way Conference Calling			

## Kansas UNE Nonrecurring Charges

<u>Unbundled Network Element</u>	<u>Final Rates</u>		<u>Reference</u>
	<u>Initial</u>	<u>Additional</u>	
<b>ISDN PRI Port Features</b>			
Dynamic Channel Allocation	\$5.84		1, 3
Backup D-Channel	\$35.78		1, 3
<b>Analog Trunk Port Features (per feature per port)</b>			
DID #s - Initial 100 #s	\$15.21		1, 3
- Initial 10 #s	\$14.11		1, 3
Subsequent add or remove 100 #s	\$12.70		8
Subsequent add or remove 10#s	\$2.10		8
<b><u>Unbundled Centrex-Like System Options</u></b>			
System Initial Establishment per Serving Office – Analog Only	\$325.37		1
Sys. Initial Establishment per Serving Office - Analog/ISDN BRI M	\$325.37		1
System Initial Establishment per Serving Office – ISDN BRI Only	\$325.37		1
System Subsequent Change per Serving Office – Analog only System		\$89.86	1
Sys. Subsqnt. Change per Serving Office – Analog/ISDN BRI mixed system		\$89.86	1
System Subsequent Change per Serving Office – ISDN BRI only system		\$89.86	1
Sys. Subsqnt. Conversion per Serving Office – Add Analog to existing ISDN BRI		\$89.86	1
Sys. Subsqnt. Conversion per Service Office – Add ISDN BRI to existing Analog		\$89.86	1
<b><u>Analog Line Port Centrex-Like Features</u></b>			
Standard feature initialization per Analog Line Port	\$1.00		3, 4
Individual Features (per feature per port):	\$0.05		7
Automatic Callback Calling/Business Group Callback			
Call Forwarding Variable/Business Group Call Forwarding Variable			
Call Forwarding Busy Line			
Call Forwarding Don't Answer			
Call Hold			
Call Pick-up			
Call Transfer – All Calls			
Call Waiting – Intragroup/Business Group Call Waiting			
Call Waiting – Originating			
Call Waiting – Terminating			
Class of Service Restriction – Fully Restricted			
Class of Service Restriction – Semi Restricted			
Class of Service Restriction – Toll Restricted			
Consultation Hold			
Dial Call Waiting			
Directed Call Pickup – Non Barge In			
Directed Call Pickup – With Barge In			
Distinctive Ringing and Call Waiting Tone			

## Kansas UNE Nonrecurring Charges

<u>Unbundled Network Element</u>	<u>Final Rates</u>		<u>Reference</u>
	<u>Initial</u>	<u>Additional</u>	

Hunting Arrangement – Basic  
Hunting Arrangement – Circular  
Speed Calling Personal (short list)  
Three-Way Calling

### ISDN BRI Port Unbundled Centrex-like Features

Circuit Switched Voice (CSV)/(CSD) per ISD BRI Port	\$2.00		3, 4
Standard feature initialization per ISDN BRI Device	\$1.00		3, 4
Individual features (per feature/B Channel):	\$0.05		7
Additional Call Offering for CSV			
Automatic Callback Calling			
Call Forwarding Busy Line			
Call Forwarding Don't Answer			
Call Forwarding Variable			
Call Hold			
Call Pickup			
Call Transfer – All Calls			
Class of Service Restriction – Fully Restricted			
Class of Service Restriction – Semi Restricted			
Class of Service Restriction – Toll Restricted			
Consultation Hold			
Dial Call Waiting			
Directed Call Pickup – Non Barge In			
Directed Call Pickup – With Barge In			
Distinctive Ringing			
Hunting Arrangement – Basic			
Hunting Arrangement – Circular			
Speed Calling Personal (short list)			
Three-Way Calling			

### Dedicated Transport

#### Entrance Facilities

##### DS1

Zone 1/Rural	\$221.15	\$87.70	2
Zone 2/Suburban	\$221.15	\$87.70	2
Zone 3/Metro	\$221.15	\$87.70	2

##### DS3

Zone 1/Rural	\$260.45	\$107.45	2
Zone 2/Suburban	\$260.45	\$107.45	2
Zone 3/Metro	\$260.45	\$107.45	2

# Kansas UNE Nonrecurring Charges

<u>Unbundled Network Element</u>	<u>Final Rates</u>		<u>Reference</u>
	<u>Initial</u>	<u>Additional</u>	
OC3			
Zone 1/Rural	\$273.05	\$105.60	2
Zone 2/Suburban	\$273.05	\$105.60	2
Zone 3/Metro	\$273.05	\$105.60	2
OC12			
Zone 1/Rural	\$273.05	\$105.60	2
Zone 2/Suburban	\$273.05	\$105.60	2
Zone 3/Metro	\$273.05	\$105.60	2
<u>Interoffice Transport</u>			
Voice Grade	\$17.88	\$17.88	1
DS1			
Zone 1/Rural	\$136.65	\$78.80	2
Zone 2/Suburban	\$136.65	\$78.80	2
Zone 3/Metro	\$136.65	\$78.80	2
Interzone	\$136.65	\$78.80	2
DS3			
Zone 1/Rural			
Zone 2/Suburban	\$158.10	\$97.75	2
Zone 3/Metro	\$158.10	\$97.75	2
Interzone	\$158.10	\$97.75	2
OC3			
Zone 1/Rural	\$168.90	\$97.50	2
Zone 2/Suburban	\$168.90	\$97.50	2
Zone 3/Metro	\$168.90	\$97.50	2
Interzone	\$168.90	\$97.50	2
OC12			
Zone 1/Rural	\$168.90	\$97.50	2
Zone 2/Suburban	\$168.90	\$97.50	2
Zone 3/Metro	\$168.90	\$97.50	2
Interzone	\$168.90	\$97.50	2
<u>Line Information Database (LIDB)</u>			
LIDB Service Order	\$12.70		8
Validation Query (Calling Card and BNS)	N/A		
Query Transport	N/A		
CNAM Query	N/A		
Service Establishment Charge	\$50.40		8

## Kansas UNE Nonrecurring Charges

<u>Unbundled Network Element</u>	<u>Final Rates</u>		<u>Reference</u>
	<u>Initial</u>	<u>Additional</u>	
<u>LSP to SS7 STP--Cross Connects</u>			
STP to Collocators Cage DS0	\$ 100.52	\$82.47	1
STP to Collocators Cage DS1	\$ 90.52	\$72.48	1
STP to SWB Trunk Distributing Frame	\$ 100.03	\$81.99	1
STP to SWB DSX Frame	\$ 90.52	\$72.48	1
SS7 Links			
STP Access Connection	N/A		
STP Access Link	N/A		
<u>STP Port</u>			
STP Port Termination	\$162.27		1
Point Code Addition	\$50.40		8
Global Title Translation	\$7.63		1
<u>Maintenance of Service (Basic, OT, Premium)</u>			
Basic, per half hour	\$62.34	\$29.97	8
Overtime, per half hour	\$77.80	\$37.70	8
Premium, per half hour	\$93.25	\$45.42	8
<u>Service Order--Manual</u>			
New Service	\$12.35		C,10 11
Change	\$12.35		C,10
Record	\$12.35		C,10
Disconnect	\$12.35		C,10
<u>Electronic Simple Service Order</u>			
	\$2.35		C,7 12
<u>Time and Material</u>			
Basic, per half hour	\$62.34	\$29.97	8
Overtime, per half hour	\$77.80	\$37.70	8
Premium, per half hour	\$93.25	\$45.42	8
<u>Unauthorized Change Investigation</u>			
	\$6.83	\$6.83	1
<u>LSP Emergency Contact for Non-Pub Svc.</u>			
	\$2.60	N/A	1
<b>Directory WP section</b>			
<u>White Pages Listing, Book, and Delivery</u>			
<u>Zone 1 /Rural</u>			
NRC to enter or delete	\$0.33	\$0.33	1
Initial Delivery per Book	\$1.111	\$1.111	1
Subsequent Delivery per Book	\$1.375	\$1.375	1
Price for including an LSP page to SWBT directory (One-sided)	\$85.17	\$85.17	1

## Kansas UNE Nonrecurring Charges

<u>Unbundled Network Element</u>	<u>Final Rates</u>		<u>Reference</u>
	<u>Initial</u>	<u>Additional</u>	
<u>Zone 2 /Suburban</u>			
NRC to enter or delete	\$0.33	\$0.33	1
Initial Delivery per Book	\$0.913	\$0.913	1
Subsequent Delivery per Book	\$1.265	\$1.265	1
Price for including an LSP page to SWBT directory (One-sided)	\$104.03	\$104.03	1
<u>Zone 3 /Urban</u>			
NRC to enter or delete	\$0.33	\$0.33	1
Initial Delivery per Book	\$2.93	\$2.93	1
Subsequent Delivery per Book	\$3.36	\$3.36	1
Price for including an LSP page to SWBT directory (One-sided)	\$1,714.64	\$1,714.64	1
<u>E911</u>			
Combined ANI & Selective Routing	\$1,033.00	\$517.00	9
Combined ANI & Auto. Location ID (ANI/ALI)			
Direct Trunk	\$576.00	\$288.00	9
Routed	\$956.00	\$478.00	9
Combined ANI/ALI/SR	\$1,383.00	\$692.00	9
LSP to Control Office	\$312.00	\$312.00	9

## References

1. February 19, 1999 Order, Attachment B.
  2. Based on 1/3 SWBT and 2/3 AT&T Proposed Costs
  3. AT&T Cost Estimation not Used, Due to Erroneous Application of 5% Factor
  4. Relationship to cost of similar element, or to cost study results.
  5. Missouri Rate from prior order.
  6. DS1 Trunk Port Rate
  7. SWBT and AT&T cost studies in agreement.
  8. Rate from SWBT Cost Study
  9. SWBT Tariff Rates
  10. Electronic Service Order rate plus \$10 surcharge.
  11. Rate for similar element.
  12. Based on 1/3 SWBT and 2/3 AT&T Proposed Costs except for CPC function
  13. SWBT offers this service in the K2A. Its appearance on this list is not a determination that SWBT is required to offer the UNE. Such determination is being undertaken elsewhere.
  14. SWBT Study adjusted for CPC at 5% and I & M at 20%
- C. Changed item since the last issue of Attachment B